



THE CITY OF NEW YORK
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July 8, 2016

VIA ECF

Honorable Marilyn D. Go
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Adesola Agoro v. City of New York et al.,
15 CV 4339 (RJD) (MDG)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York and Police Officers Gaetje Doxy and Vincent Linder in the above-referenced matter.¹ I write, with the consent of plaintiffs' counsel Robert Marinelli, Esq., to respectfully request an extension of discovery from July 11, 2016 until August 8, 2016. This is the second request for an extension of discovery.

The reason for this request is that attempts to schedule depositions of the parties have been unsuccessful. Although plaintiffs were scheduled to be deposed on June 29, 2016, plaintiffs had an emergency and thus, had to cancel on the morning of the deposition. After conferring with plaintiffs' counsel, plaintiffs are available to have their depositions taken on either July 11, 2016 or July 12, 2016. However, as Officer Doxy is scheduled to take vacation

¹ This case is being handled by Assistant Corporation Counsel Fayola Alibey, who is not yet admitted in the Eastern District. Ms. Alibey is handling this matter under supervision and can be reached at (212) 356-2334.

from July 11, 2016 until July 28, 2016, he is unavailable to be deposed until the first week of August.

Accordingly, for the foregoing reasons the parties respectfully request that the Court extend discovery from July 11, 2016 until August 8, 2016 for the parties to conduct depositions.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Daniel Passeser
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY ECF**
Robert Marinelli, Esq.
Attorney for Plaintiff